EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

INSTALLATION ADDRESS

SQUIRE CORRUGATED CONTAINER
1500 LOWER ROAD
LINDEN NJ 07036

EPA Form 8700-12B (4-80)

TO: PERMIT ADMINISTRATION BRANCH ROOM 432 ATT: D. ABRINES

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Batch 985

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

C C

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
C F NJD042027482 T/A C 1		

I. Name of Installation

SQUIRE CORRUGATED CONTAINER

II. Installation Mailing Address

Street or P.O. Box

C 3 1500 LOWER ROAD

City or Town	State	ZIP Code
C 4 LINDEN	NJ	07036

III. Location of Installation

Street or Route Number

C 5 1500 LOWER ROAD

City or Town	State	ZIP Code
C 6 LINDEN	NJ	07036

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
C 2 JAMES BENEROFF MGR	201 561 8550

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
C R SEYMOUR BENEROFF	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- ☐ 1a. Generator
- ☒ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner

B. Used Oil Fuel Activities

- ☐ 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - ☐ a. Generator Marketing to Burner
  - ☐ b. Other Marketer
  - ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification ☐ B. Subsequent Notification *(complete item C)*	C. Installation's EPA ID Number

ID — For Official Use Only														
C													T/A	C
W														1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
	JAMES BENEROFF MGR	4-4-88

TO: PERMIT ADMINISTRATION BRANCH ROOM 432 ATT: D. ABRINES

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028, Expires 9-30-88
GSA No. 0246-EPA-DT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

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For Official Use Only

Comments

039-Union

Installation's EPA ID Number	Approved	Date Received (yr. mo. day)
NJD042027482		880404

I. Name of Installation

SQUARE CORRUGATED CONTAINER

II. Installation Mailing Address

Street or P.O. Box: 1500 LOWER ROAD

City or Town	State	ZIP Code
LINDEN	NJ	07036

III. Location of Installation

Street or Route Number: 1500 LOWER ROAD

City or Town	State	ZIP Code
LINDEN	NJ	07036

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Name and Title (last, first, and job title)	Phone Number (area code and number)
JAMES BENEROFF MGR	201 561 8550

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☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. [illegible]

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☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)

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☒ A. First Notification ☐ B. Subsequent Notification

C. Installation's EPA ID Number

Continue on reverse

PERMIT ADMINI BRANCH Room 432

ATT. D ABRINES

ID — For Official Use Only

C W

V/A 1

X. Description of Hazardous Wastes (continued from front)

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Signature	Name and Official Title (type or print)	Date Signed
	JAMES BENEROF MGR	4-4-88

EPA Form 8700-12 (Rev. 11-85) Reverse

1988 APR -4 PM 2:09

AGENCY, REGION II

HWR-001
3/95

NJX000335539
3-7-97

State of New Jersey
Department of Environmental Protection
Manifest Section
CN 421, 401 East State Street
Trenton, New Jersey 08625-0421

"Request to Deactivate EPA ID Number"

EPA ID No. NJD 042027482

Company Name: SQUIRE CORRUGATED CONTAINER

Site Address: 1500 Lower Road (street) Linden (city / town)
NJ (state) 07036 (zip code) 51 (lot) 580 (block)

Mailing Address: PO Box 4369 (street / p.o. box) Linden (city / town)
NJ (state) 07036 (zip code)

Company Contact: James Beneroff (name) 908-862-9111 (area code and phone number)

Reasons for deactivating EPA ID No. (Check all appropriate boxes.)

- [x] The EPA ID number was obtained for a one time cleanup which is completed.
- [ ] The site has completed an ECRA cleanup (indicate ECRA Case #_____).
- [ ] Other _____

Is the site presently occupied? (circle yes or no)

Sign and date the application below, and retain the last page (pink copy) for your records.

James Beneroff (printed name) James Beneroff (signature)

VP (title) 3/3/97 (date)

Submission of false information is a violation of N.J.A.C. 7:26-5.6 and N.J.A.C. 7:26-7.3.

copies: White - Manifest Section
Yellow - USEPA Region II
Pink - Applicant

deactivated 5/3/95

4/9/97 2/K - 2446 2N6

17 May 1995

Compliance Evaluation Inspection

Squire Corrugated Container Corp. - EPA I.D. No. NJD042027482
1500 Lower Road
Linden, New Jersey 07036

Inspectors: Bart George, Sam Kerns (AWM-HWC)

A compliance evaluation inspection was conducted on 3 May 1995 at Squire Corrugated Container Corporation (SCCC). Mr. James Beneroff, Vice President of SCCC, served as the facility representative. When asked why the facility had obtained an EPA I.D. Number, Mr. Beneroff replied that they were motivated by the presence on the site of waste oil that had been generated over a number of years from vehicles and from maintenance operations. This waste oil, classified as X726, was shipped in 1988 to Waste Conversion in Hatfield, Pennsylvania (EPA I.D. No. PAD085690592).

Facility Operations

SCCC manufactures corrugated boxes. After manufacture, the corrugated boxes are packaged and shipped using trucks leased from Hertz and based at the facility. After discussing the equipment, operations, and management of the facility, Mr. Beneroff accompanied the inspectors on a walk-through inspection of the facility.

Equipment. Major pieces of equipment include three printing presses of the letter-press type, one of which uses water-based inks while the remaining two use glycol-paste inks. The facility employs the operations of die-cutting (for form and slotting), printing, gluing, and folding to manufacture corrugated containers of various sizes with specified labelling. Mr. Beneroff estimated that die-cutting constitutes 50% of the work done at the facility. All of the above operations except gluing are performed in all three printing lines. The gluing operation is limited to the flexographic ("Flexall") printing line which uses water-based inks. The flexographic printer was purchased "used" in 1980.

Photography Shop. A photography shop at the facility is used to make the plates used on the printing presses to print the specified graphics and information on the boxes. A photopolymer system is used to develop the photographic plates, thereby producing the image to be printed. The photography operation is being phased out since this function is increasingly being assumed by five Apple Mackintosh computers at the facility.

Machine Shop. The facility has a small machine shop on-site for doing repair and maintenance work.

Raw Materials. The most basic raw materials used to produce these boxes are sheets of cardboard, inks, and glue. Copies of MSDSs were obtained for: the series of water-based flexographic inks used ("Huberflex" and "Huberlene", J. M. Huber Corp., Edison, NJ); the series of glycol letterpress inks used ("Kraftset", J. M. Huber Corp., Edison, NJ); a cleaning agent used on non-printing surfaces in the facility ("Lemonex," Zep Manufacturing Co., Atlanta, GA); and a photopolymer resin ("Merigraph Systems GC75," Hercules, Inc., Wilmington, DE) that is used in the photography shop for developing photographic plates. The glue used, also water-based, is a PVA adhesive supplied by Titan Adhesives, New Jersey and other companies.

Use of Water. Although the facility initially had a septic system, it was connected to the municipal sewer system two years ago according to Mr. Beneroff. Very little water is used at SCCC, according to Mr. Beneroff, and most of that water is used in the facility's rest rooms.

Cleaning of Equipment. Water and textile rags are used to clean the printing surfaces. According to Mr. Beneroff, detergent is used with textile rags (and occasionally with water) to clean other surfaces in the facility.

Underground Storage Tank. The facility has a 5,000-gallon UST for storing diesel fuel. The UST is registered with the state.

Waste Generation and Management

Waste Generated in Equipment. After a production run, the water-based ink used in the flexographic press is collected from the press into a single vessel containing accumulated inks of various colors. This aggregate ink, termed "black concentrate," is reused to supplement the black ink supply. Although they could be discharged to the sewer, according to Mr. Beneroff, the small quantities of wash water used to clean the flexographic printer are accumulated in a tank (~150-200 gallons) and sent to a sister facility for filtration. According to the MSDS, the series of water-based inks used at SCCC would not be a hazardous waste if discarded.

According to Mr. Beneroff, the nature of the glycol-paste printing process is such that no waste ink is generated beyond the residues removed when the presses are cleaned, e.g., before changing the ink color. Based on the MSDS, the series of glycol-paste printing inks used at SCCC would not be a hazardous waste if discarded.

All cardboard clippings generated during the slotting operations are collected and shipped to Fort Howard Paper Company for recycling. Fort Howard recycles paper and manufactures paper products such as tissue and toilet paper.

According to the MSDS for the Lemonex detergent that is used for general (non-printing) surface cleaning at SCCC, unused detergent would have to be managed as a D002 hazardous waste if it is discarded by a facility which generates more than 100 kg of hazardous waste in a calendar month. The wash water that is collected might likewise have to be managed as hazardous waste if it retains the characteristic of corrosivity. Mr. Beneroff said, regarding cleaning operations at SCCC, that: 1) no unused detergent has ever been discarded by SCCC; and 2) only about one or two quart bottles of detergent are used during the course of a typical month. It therefore appears that no regulatable quantities of D002 hazardous waste are, or are likely to be, generated by SCCC as a result of its cleaning operations.

Waste Generated in the Photography Shop. Due to closed-system recycling, there appears to be insignificant generation of waste in the photo shop. Nevertheless, according to the MSDS for the photopolymer resin that is used, if the resin were to be discarded it would be neither a listed nor a characteristic RCRA hazardous waste. Mr. Beneroff noted that the town of Linden had determined that filing for a water permit was not necessary for the photo shop.

Waste Generated in the Machine Shop. The machine shop does not appear to be a significant source of hazardous waste.

Waste Oil. According to Mr. Beneroff's estimate, a total of five or six gallons of waste oil continues to be generated by the facility in the course of a year. This is far less than the amount which prompted SCCC to obtain an EPA I.D. Number. The waste oil is taken for recycling to a nearby gas station under an agreement with its owner.

Records Review

Manifests and MSDSs were among the documents reviewed. Copies of MSDSs for raw materials, referred to in the preceding section on raw materials, were obtained. A copy was obtained of NJDEP manifest number NJA 1895362 for a non-routine shipment of six drums of non-regulated material (90% bottom ink sludge and 10% aqueous liquid) to S&W Waste, Inc. A copy of S&W's analysis of the facility's ink sludge was also obtained. All copies of records obtained from SCCC are included with this report.

Closing Interview

No evidence of regulatable levels of hazardous waste generation by SCCC was found during this inspection. Moreover, the conditions which prompted the facility to apply for an EPA I.D. Number are no longer extant. The inspectors therefore suggested to Mr. Beneroff that it might be expedient to take steps to have the facility's EPA I.D. Number revoked. This would allow SCCC to operate under the less demanding requirements of a conditionally-exempt small quantity generator. Some of the merits of this course of action were briefly discussed, and Mr. Beneroff seemed interested.

J.M. HUBER

MATERIAL SAFETY DATA SHEET

SECTION I: IDENTIFICATION

Trade Name: GLYCOL LETTERPRESS INK - KRAFTSET
Group Name: 617/618 SERIES AND KP SERIES

Manufacturer: J. M. HUBER CORPORATION
Ink Division
Address: 333 Thornall St
City, State, Zip: Edison, NJ 08818
Telephone Number: 908-906-1760

Additional Information:
Glycol Letterpress Ink

SECTION II: HAZARDOUS INGREDIENTS

INGREDIENTS:	CAS #	Min-LIMITS (%)-Max
Di-(2-Ethylhexyl) Phthalate	117-81-7	5
Ethylene Glycol	107-21-1	24

HAZARD DATA:	Agency / Test	Concentration
Di-(2-Ethylhexyl) Phthalate	OSHA / PEL	5 MG/M3
	ACGIH / TLV	5 MG/M3
Ethylene Glycol	ACGIH / TLV	50 PPM

Additional Information:
An NTP study shows that DEHP caused tumors in mice & rats at extremely high dose levels.
The CPSC reports that DEHP is not mutagenic, and owing to difference between animal and human metabolism, does not expect humans to be at risk at lower typical exposure levels.
Epidemiological studies of workers at a DEHP plant revealed no adverse health effects attributed to DEHP exposure.
When using the precaution in the MSDS, no increase in risk is expected in handling inks containing DEHP compared to those without DEHP.

Toxic, animal teratogen for ethylene glycol.

SECTION III: PHYSICAL CHARACTERISTICS

PHYSICAL DATA:		QTY	UNITS	TEXT
Boiling Point:	>	350	DEG F	

Solubility Data: miscible in all proportions

Appearance and Odor:
Paste - mild odor

Additional Information:
Vapor density: heavier vs. air.
Liquid density: heavier vs. water.
Evaporation rate: slower vs. Butyl Acetate.
VOC: Less than 100 grams of VOC per liter of ink.

SECTION IV: FIRE & EXPLOSION HAZARDS

(Flammability Classification)

Type: IIIB/exempt Non-hazardous
Flash Pt./Method: > 200 DEG F TCC
Extinguishing Media:
Foam, "Alcohol" Foam, C02, Dry Chemical, Water Fog

Unusual Fire and Explosion Hazards:
None
Special Firefighting Procedures:
None

SECTION V: HEALTH HAZARD DATA

Primary Routes of Entry:
Dermal

Effects of Overexposure:
Inhalation-
None if ink is not heated above press temperatures.
Skin-
Mild irritation possible with prolonged or repeated contact.
Eye-
Mild irritation possible.
Ingestion-
May cause gastrointestinal discomfort or pain, dizziness, malasia, lumbar pain, oliguria uremia & central nervous system depression.

Medical Conditions Aggravated by Exposure:
None

Emergency and First Aid Procedures:
Inhalation-
None normally required.
Skin-
Wash with soap and water.
Eye-
Flush with water for 15 minutes. If irritation persists, seek medical aid.
Ingestion-
Give two glasses of water and induce vomiting. Call physician immediately.

SECTION VI: REACTIVITY DATA

Reactivity Classification: STABLE
Conditions to Avoid:
Avoid contact with strong acids, alkalies or oxidizers.

SECTION VII: PRECAUTIONS FOR SAFE HANDLING AND USE

Procedure when Material is Released or Spilled:
Clean up and dispose of waste as below.

Waste Disposal Method:
Follow federal, state and local regulations.

Precautions to be Taken in Handling and Storing:
NFPA Class IIIB Storage

SECTION VIII: SPECIAL PROTECTION INFORMATION

Ventilation:
None

Personal Protective Equipment:
Protective Gloves: as needed to prevent prolonged or repeated skin contact.
Respiratory Protection: None
Eye Protection: as needed to prevent prolonged or repeated contact.

SECTION IX: SPECIAL PRECAUTIONS

OSHA / HMIS LABEL

HEALTH 2
FLAMMABILITY 1
REACTIVITY 0

LABEL CODE: 0 - Minimal ; 1 - Slight ; 2 - Moderate
3 - Serious ; 4 - Severe

Additional Regulatory Concerns:

OSHA
Has this product or any of its ingredients in concentrations above 0.1% been reported as a carcinogen in:

NTP? YES IARC Monographs? YES OSHA Regulations? NO

Additional Information:
SUPERFUND AMENDMENTS and REAUTHORIZATION ACT of 1986 (SARA) TITLE III SECTION 313
Components present at a level which could require reporting are:
Di-(2-Ethylhexyl) Phthalate
CAS 117-81-7 5%
Ethylene Glycol
CAS 107-21-1 24%
CALIFORNIA PROPOSITION 65
This product contains 5% Di-(2-Ethylhexyl) Phthalate CAS 117-81-7 which has been designated by the State of California as a chemical known to the State to cause cancer.

Date MSDS Created: 20-AUG-90 Prepared by: |OBERT H. MESSING
Phone: 908-906-1760

Date Last Revised: 28-FEB-91

4099

MATERIAL SAFETY DATA SHEET
AND SAFE HANDLING AND DISPOSAL INFORMATION

CLEAN ACROSS AMERICA AND THROUGHOUT THE WORLD™

ZEP MANUFACTURING COMPANY
P.O. BOX 2015
ATLANTA, GEORGIA 30301

[redacted]

03/05/94
ISSUE DATE: 05/04/92
SUPERSEDES: 02/01/91

ZEP LEMONEX
PRODUCT NO.: 0675 — Cleaner - Disinfectant - Deodorant

SECTION I - EMERGENCY CONTACTS

TELEPHONE:
(404) 352-1680 — *BETWEEN 8:00 AM - 5:00 PM (EST)*

MEDICAL EMERGENCY:
(404) 435-2973
(404) 432-2873
(404) 424-4789
(404) 319-6151
(404) 242-3561
NON-OFFICE HOURS, WEEKENDS AND HOLIDAYS, PLEASE CALL YOUR **LOCAL POISON CONTROL**

TRANSPORTATION EMERGENCY:
(404) 922-0923

CHEMTREC:
1-800-424-9300 — **TOLL-FREE - ALL CALLS RECORDED**

DISTRICT OF COLUMBIA:
(202) 483-7616 — **ALL CALLS RECORDED**

SECTION II --HAZARDOUS INGREDIENTS

DESIGNATIONS	TLV (PPM)	EFFECTS (SEE REVERSE)	% IN PROD.
** SODIUM METASILICATE ** silicic acid (H2-Si-O3) disodium salt; water glass; CAS# 6834-92-0; RTECS# VV9275000; OSHA Dust Limit-2mg/m3 (for powders only).	N/D	COR	< 5
** NONYLPHENOXYPOLY(ETHYLENEOXY)ETHANOL ** poly(oxy-1,2-ethanediyl), alpha-(nonylphenyl)-omega-hydroxy; CAS# 9016-45-9; RTECS# MD905000; OSHA PEL-N/D	N/D	EIR	5-10
** QUATERNARY AMMONIUM CHLORIDES ** blend of alkyl dimethylbenzyl ammonium chlorides (CAS# 68391-01-5), alkyl dimethyl ethylbenzyl ammonium chlorides (CAS# 68956-79-6), and ethanol (CAS# 64-17-5); OSHA PEL-N/D	N/D	COR TOX CBL	< 5
** TETRASODIUM ETHYLENEDIAMINE TETRAACETATE ** ethylenedinitrilo tetraacetic acid, tetrasodium salt; EDTA; CAS# 64-02-8, RTECS# AH4025000; OSHA PEL N/D	N/D	IRR	< 5
** TETRAPOTASSIUM PYROPHOSPHATE ** TKPP; diphosphoric acid, tetrapotassium salt; CAS# 7320-34-5; RTECS# NONE; OSHA PEL-N/D.	N/D	IRR	< 5

SECTION III - HEALTH HAZARD DATA

Special Note: MSDS data pertains to the product as dispensed from the container. Adverse health effects would not be expected under recommended conditions of use (diluted) so long as prescribed safety precautions are practiced.

Acute Effects of Overexposure:
Product in concentrated form is a severe eye irritant. Overexposure may lead to eye tissue damage which can be permanent. Skin contact may produce irritation.

Chronic Effects of Overexposure:
Repeated or prolonged skin contact may produce chronic inflammation or dermatitis, characterized by redness, scaling, or itching. Repeated eye exposure may produce chronic inflammation of the eye or corneal damage. None of the hazardous ingredients are listed as carcinogens by IARC, NTP, & OSHA

Est'd PEL/TLV: Not established — **Primary Routes of Entry:** N/A

HMIS Codes: HEALTH 3;FLAM. 0;REACT. 0;PERS. PROTECT. B ;CHRONIC HAZ. NO

FIRST AID PROCEDURES:
Skin: Immediately flush contaminated skin with plenty of water for at least 15 minutes. Get medical attention if irritation develops.
Eyes: Immediately flush eyes with plenty of water for at least 15 minutes, occasionally lifting upper and lower lids. Get medical attention at once.
Inhale: Move exposed person to fresh air. If irritation persists, get medical attention promptly.
Ingest: If this product is swallowed, do not induce vomiting. If victim is conscious give plenty of water to drink. Get medical attention at once.

SECTION IV - SPECIAL PROTECTION INFORMATION

Protective Clothing: Wear neoprene, nitrile, or natural rubber gloves or gloves with proven resistance to the ingredients listed.
Eye Protection: Wear splash-proof safety goggles especially if contact lenses are worn.
Respiratory Protection: Respiratory protection may be unnecessary since product does not give off significant quantities of vapor.
Ventilation: If vapors are detected, ventilate work area by opening windows and using exhaust fans.

SECTION V - PHYSICAL DATA

Boiling Point (°F):	215 Approx.	**Specific Gravity:**	1.06	**Vapor Pressure (mmHg):**	N/A
Percent Volatile by Volume (%):	APP.83	**Vapor Density (air = 1):**	N/A	**Evaporation Rate (WATER = 1):**	1.0
Solubility in Water:	COMPLETE	**pH (concentrate):**	12.9	**pH (use dilution of 1% SOLUTION):**	10.8

Appearance and Odor: BLUE-GREEN, CLEAR LIQUID WITH LEMON-CITRUS FRAGRANCE.

SECTION VI - FIRE AND EXPLOSION DATA

Flash Point (°F) (method used): NONE (TCC)
Flammable Limits: LEL N/A UEL N/A
Extinguishing Media: Noncombustible.
Special Fire Fighting: None
Unusual Fire Hazards: None

SECTION VII - REACTIVITY DATA

Stability:	Stable
Incompatibility (avoid):	Strong oxidizing agents.
Polymerization:	Will not occur.
Hazardous Decomposition:	Carbon dioxide, carbon monoxide, and other unidentified organic compounds.

SECTION VIII - SPILL AND DISPOSAL PROCEDURES

Steps to be Taken in Case Material is Released or Spilled:
Observe safety precautions in sections 4 & 9 during clean-up. Absorb spill on an inert absorbent material (e.g. Zep-O-Zorb); pick up and place in a clean D.O. T. specification container for disposal. Wash area thoroughly with a detergent solution and then rinse well with water.

Waste Disposal Method:
Liquids cannot be sent to landfills unless solidified. Unusable product and some collected, spent use-dilutions may require disposal as a hazardous waste at a permitted treatment/storage/disposal facility. In most states hazardous wastes in total amounts of 220 lbs. Or less per month may be disposed of in a chemical or industrial waste landfill. If company effluent is ultimately treated by a publicly owned treatment works, neutralization of spent tank-solutions with subsequent discharge to the sewer may be possible. Consult local, state and federal agencies for proper disposal method in your area.

RCRA Hazardous Waste Numbers: D002 (SEE ABOVE)

SECTION IX - SPECIAL PRECAUTIONS

Precautions to be Taken When Handling and Storing:
Store tightly closed container in a dry area at temps. between 40-120 degrees F. Store away from strong acids and oxidizing compounds. Keep product away from skin and eyes. PRODUCT MAY DAMAGE OR DISCOLOR VINYL-SUCH AS TILE WALLPAPER, OR SHOWER CURTAINS- UNLESS PROPERLY DILUTED AND RINSED PROMPTLY & THOROUGHLY FROM THESE SURFACES. Keep out of the reach of children.

SECTION X - TRANSPORTATION DATA

DOT Proper Shipping Name: NONE
DOT Hazard Class: N/A
DOT I.D. Number: N/A
DOT Label/Placard: NONE
EPA TSCA Chemical Inventory: ALL INGREDIENTS ARE LISTED
EPA CWA 40CFR Part 117 substance (RQ in a single container) : N/A

NOTICE

Thank you for your interest in, and use of, Zep products. Zep Manufacturing Co. is pleased to be of service to you by supplying this Material Safety Data Sheet for your files. Zep Manufacturing is concerned for your health and safety. Zep products can be used safely with proper protective equipment and proper handling practices consistent with label instructions and the MSDS. Before using any Zep product, be sure to read the complete label and the Material Safety Data Sheet.

As a further word of caution, Zep wishes to advise that serious accidents have resulted from the misuse of "emptied" containers. "Empty" containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT pressurize, cut, weld, braze, solder, drill, grind or expose such containers to heat, flame, or other sources of ignition; they may explode or develop harmful vapors and possibly cause injury or death. Clean empty containers by triple rinsing with water or an appropriate solvent. Empty containers must be sent to a drum reconditioner before reuse.

TERMS AND ABBREVIATIONS USED IN THE MSDS: BY SECTION ALPHABETICALLY:

SECTION II: HAZARDOUS INGREDIENTS

CAR; Carcinogen - A chemical listed by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC) or OSHA as a definite or possible human cancer causing agent.
CAS #; Chemical Abstract Services Registry Number - A universally accepted numbering system for chemical substances.
CBL: Combustible - At temperatures between 100°F and 200°F chemical gives off enough vapor to ignite if a source of ignition is present as tested with a closed cup tester.
CNS: Central Nervous System depressant reduces the activity of the brain and spinal cord.
COR: Corrosive - Causes irreversible alterations in living tissue (e.g. burns).
DESIGNATIONS: Chemical and common names of hazardous ingredients.
EIR: Eye Irritant Only - Causes reversible reddening and/or inflammation of eye tissues.
EXPOSURE LIMITS; The time weighted average (TWA) airborne concentration at which most workers can be exposed without any expected adverse effects. Primary sources include ACGIH TLV's, and OSHA PEL's (TWA, STEL and ceiling limits)
ACGIH; American Conference of Governmental Industrial Hygienists.
CEILING; The concentration that should not be exceeded in the workplace during any part of the working exposure.
OSHA; Occupational Safety and Health Administration
PEL: Permissible Exposure Limit- A set of time weighted average exposure values, established by OSHA, for a normal 8-hour day and a 40-hour work week.
PPM; Parts per million - unit of measure for exposure limits.
(S) SKIN: Skin contact with substance can contribute to overall exposure.
STEL: Short Term Exposure Limit- Maximum concentration for a continuous 15-minute exposure period.
TLV; Threshold Limit Value - A set of time weighted average exposure limits, established by the ACGIH, for a normal 8-hour day and a 40-hour work week.
FBL; Flammable - At temperatures under 100°F, chemical gives off enough vapor to ignite if a source of ignition is present as tested with a closed cup tester.
HAZARDOUS INGREDIENTS; Chemical substances determined to be potential health or physical hazards by the criteria established in the OSHA Hazard Communication Standard - 29 CFR 1910.1200
HTX; Highly toxic - the probable lethal dose for 70 kg (150 lb.) man and may be approximated as less than 6 teaspoons (2 tablespoons).
IRR; Irritant - Causes reversible effects in living tissues (e.g. inflammation) - primarily skin and eyes.
N/A: Not Applicable - Category is not appropriate for this product.
N/D: Not Determined - Insufficient information for a determination for this item.
RTECS #; Registry of Toxic Effects of Chemical Substances - an unreviewed listing of published toxicology data on chemical substances.
SARA; Superfund Amendments and Reauthorization Act - Section 313 designates chemicals for possible reporting for the Toxics Release Inventory.
SEN; Sensitizer - Causes allergic reaction after repeated exposure.
TOX: Toxic - The probable lethal dose for a 70 kg (150 lb.) man is one ounce (2 tablespoons) or more.

SECTION III: HEALTH HAZARD DATA

ACUTE EFFECT: An adverse effect on the human body from a single exposure with symptoms developing almost immediately after exposure or within a relatively short time.
CHRONIC EFFECT: Adverse effects that are most likely to occur from repeated exposure over a long period of time
EST'D PEL/TLV; This estimated, time-weighted average, exposure limit, developed by using a formula provided by the ACGIH, pertains to airborne concentrations from the product as a whole. This value should serve as guide for providing safe workplace conditions to nearly all workers.
HMIS CODES: Hazardous Material Identification System - a rating system developed by the National Paint and Coating Association for estimating the hazard potential of a chemical under normal workplace conditions. These risk estimates are indicated by a numerical rating given in each of three hazard areas (Health/Flammability/Reactivity) ranging from a low of zero to a high of 4. A chronic hazard is indicted with a yes. Consult HMIS training guides for Personal Protection letter codes which indicate necessary protective equipment.
PRIMARY ROUTE OF ENTRY; The way one or more hazardous ingredients may enter the body and cause a generalized-systemic or specific-organ toxic effect.
ING: Ingestion - A primary route of exposure through swallowing of material.
INH: Inhalation - A primary route of exposure through breathing of vapors.
SKIN: A primary route of exposure through contact with the skin.

SECTION IV: SPECIAL PROTECTION INFORMATION

Where respiratory protection is recommended, use only MSHA and NIOSH approved respirators and dust masks.
MSHA; Mine Safety and Health Administration
NIOSH: National Institute for Occupational Safety and Health.

SECTION V: PHYSICAL DATA

EVAPORATION RATE; It refers to the rate of change from the liquid state to the vapor state at ambient temperature and pressure in comparison to a given substance (e.g. water).
pH; A value representing the acidity or alkalinity of an aqueous solution (Acidic pH = 1; Neutral pH = 7; Alkalin pH = 14)
PERCENT VOLATILE; The percentage of the product (liqu. or solid) that will evaporate at 212°F and ambient pressure
SOLUBILITY IN WATER; A description of the ability of the product to dissolve in water.

SECTION VII: REACTIVITY DATA

HAZARDOUS DECOMPOSITION; Breakdown products expected to be produced upon product decomposition or fire.
INCOMPATIBILITY: Material contact and conditions to avoid to prevent hazardous reactions.
POLYMERIZATION: Indicates the tendency of the product's molecules to combine in a chemical reaction releasing excess pressure and heat.
STABILITY: Indicates the susceptibility of the product to spontaneously and dangerously decompose.

SECTION VIII: SPILL AND DISPOSAL PROCEDURES

RCRA WASTE NOS; RCRA (Resource Conservation and Recovery Act) waste codes (40 CFR 261) applicable to the disposal of spilled or unusable product from the original container.

SECTION X: TRANSPORTATION DATA

CWA: Clean Water Act
RQ: Reportable Quantity - The amount of the specific ingredient that, when spilled to the ground and can enter a storm, sewer or natural watershed, must be reported to the National Response Center, and other regulatory agencies.
TSCA: Toxic Substances Control Act - a federal law requiring all commercial chemical substances to appear on an inventory maintained by the EPA.

DISCLAIMER

All statements, technical information and recommendations contained herein are based on available scientific tests or data which we believe to be reliable. The accuracy and completeness of such data are not warranted or guaranteed. We cannot anticipate all conditions under which this information and our products, or the products of other manufacturers in combination with our products, may be used. Zep assumes no liability or responsibility for loss or damage resulting from the improper use or handling of our products, from incompatible product combinations, or from the failure to follow instructions, warnings, and advisories in the product's label and Material Safety Data Sheet.

(Notice Revised 8/91)

HERCULES INCORPORATED
Hercules Plaza
Wilmington, DE 19894
Phone #: (302) 594-5000 (24 hrs)

MERIGRAPH* SYSTEMS GC75
Photopolymer resin

MSDS No.: 622 1725 0000-01

Supersedes MSDS No.: MER D-1725A Date: 06/01/93

I. PRODUCT IDENTIFICATION

**WARNING! MAY CAUSE MODERATE, TEMPORARY EYE AND SKIN IRRITATION.
MAY CAUSE ALLERGIC SKIN REACTION.
MAY CAUSE MILD, TEMPORARY RESPIRATORY IRRITATION.**

MERIGRAPH* SYSTEMS GC75
Photopolymer resin

(formerly MERIGRAPH* SYSTEMS MER D-1725
Photopolymer resin)

HMIS RATINGS:(1)

Health hazard:	2	Moderate
Flammability hazard:	1	Slight
Reactivity hazard:	1	Slight

CASRN: Mixture

CHEMICAL & COMMON NAME: Polyurethane-methacrylate mixture

APPEARANCE AND ODOR: Clear, pale-yellow, viscous liquid; odorless

* Registered Trademark of Hercules Incorporated

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(1)Explanation of acronyms:
HMIS: Hazardous Materials Identification System rating for product as supplied.
CASRN: Chemical Abstracts Service Registry Number
AIHA WEEL: American Industrial Hygienists Association - Workplace Environmental Exposure Level.
OSHA: Occupational Safety and Health Administration.
TLV: Registered trademark of American Conference of Governmental Industrial Hygienists for Threshold Limit Values.
TWA: Time Weighted Average
STEL: Short term exposure limit (See 29 CFR 1910.1048, March 1, 1989, revision)
C: Ceiling exposure concentration (See 29 CFR 1910.1000, March 1, 1989, rev.)
SKIN: May be absorbed through skin (See 29 CFR 1910.1048, March 1, 1989, rev.)
N/A: Not applicable

II. HAZARDOUS INGREDIENTS & EXPOSURE LIMITS

CHEMICAL & COMMON NAMES	WT. %	RECOMMENDED AIRBORNE LEVELS(1) 1992-1993 OSHA-TWA	TLV-TWA
Mono- and/or multi-functional methacrylate/acrylate monomers (2)	10-30	Not established	Not established (2)
Other ingredients (3)	Above 1	Not established	Not established

(2) Several multi-functional methacrylates/acrylates have WEELS established at 1 mg/m3.

(3) This product may contain other ingredients above one percent that may cause eye and skin irritation.

III. TYPICAL PHYSICAL & CHEMICAL CHARACTERISTICS

BOILING POINT: Polymerizes below boiling point

SOLUBILITY IN WATER: Negligible at 20 C

VAPOR PRESSURE AT 20 C: Not determined

SPECIFIC GRAVITY: Above 1.0

VAPOR DENSITY: Not determined

pH: N/A

VOLATILE (WT.), %: Negligible at 20 C

EVAPORATION RATE: Slower than butyl butyl acetate

FREEZING POINT: < 0 C (32 F)

IV. FIRE, EXPLOSION, & REACTIVITY HAZARD DATA

FLASH POINT: Above 150 C (300 F) Pensky-Martens, closed cup

FLAMMABLE LIMITS: Not determined

AUTOIGNITION TEMPERATURE: Not determined

EXTINGUISHING MEDIA:
Water spray, dry chemical, foam, carbon dioxide, or halon

SPECIAL FIREFIGHTING PROCEDURES: Use self-contained breathing apparatus.

Continued...

IV. FIRE, EXPLOSION, & REACTIVITY HAZARD DATA

...Continued

UNUSUAL FIRE & EXPLOSION HAZARDS:
Cool containers that are exposed to a fire with water to prevent overheating and polymerization of the resin. Polymerization may cause the container to overpressure and rupture.

STABILITY CONSIDERATIONS:
Stable at room temperature. Exposure to sunlight or artificial ultraviolet light will cause the resin to polymerize.

INCOMPATIBILITY WITH: Peroxides

HAZARDOUS DECOMPOSITION PRODUCTS: None

HAZARDOUS PRODUCTS OF COMBUSTION:
As with many organic compounds, carbon monoxide, carbon dioxide, and nitrogen oxides as well as aromatic or aliphatic hydrocarbons and traces of hydrogen cyanide may be expected.

HAZARDOUS POLYMERIZATION:
May occur. Spontaneous polymerization is extremely unlikely, but avoid contact with peroxides and temperatures above 100 C (212 F).

V. HEALTH HAZARD DATA

WARNING! MAY CAUSE MODERATE, TEMPORARY EYE AND SKIN IRRITATION.
MAY CAUSE ALLERGIC SKIN REACTION.
MAY CAUSE MILD, TEMPORARY RESPIRATORY IRRITATION.

SIGNS & SYMPTOMS OF OVEREXPOSURE IN THE WORKPLACE:

EYES:	May cause eye redness and pain.
SKIN:	Prolonged or repeated contact may cause skin irritation (redness, rash, and itching) or, in susceptible individuals, sensitization (allergic skin reaction).
INHALATION:	Inhaling vapors or mists may cause mild respiratory irritation (coughing, pain).
INGESTION:	Not determined; ingestion is not an expected route of industrial exposure.

EMERGENCY & FIRST AID PROCEDURES:
EYES: In case of contact, immediately flush with plenty of low-pressure water for 15 minutes. Remove any contact lenses to assure thorough flushing. Call a physician.

Continued...

V. HEALTH HAZARD DATA

EMERGENCY & FIRST AID PROCEDURES:...Continued

SKIN: Promptly wash with soap and running water. Remove contaminated clothing. Wash clothing before reuse.

INHALATION: Remove to fresh air. Call a physician.

INGESTION: If swallowed, induce vomiting. Call a physician. NEVER induce vomiting in an unconscious person.

MEDICAL CONDITIONS GENERALLY RECOGNIZED AS BEING AGGRAVATED BY EXPOSURE:

Prolonged or repeated contact may cause skin irritation or, in susceptible individuals, sensitization (allergic skin reaction). No other systemic toxic effects are known to be associated with exposure to MERIGRAPH* SYSTEMS liquid photopolymer resins.

PRIMARY ROUTE OF EXPOSURE/ENTRY:

Eye and skin contact (absorption unlikely); following standard industrial hygiene and recommended procedures, entry of the compound into the body is not expected.

CANCER INFORMATION:

The components of this mixture have NOT been listed as carcinogens by NTP (National Toxicology Program); they are NOT regulated as carcinogens by OSHA (Occupational Safety & Health Administration) and have NOT been evaluated by IARC (International Agency for Research on Cancer).

REPORTED HUMAN EFFECTS:

Hercules Incorporated has received several reports of adverse human health effects in persons working with MERIGRAPH* SYSTEMS liquid photopolymer resins. Several of the components of the unpolymerized resin mixture are known to be skin sensitizers and there have been numerous reports of dermatitis and skin rashes associated with the use of these formulated products. While workers exposed to the detergent/developer solutions have become sensitized to these solutions, these solutions have been demonstrated not to be sensitizers until after use for a period of time. Hercules has interpreted these results as evidence that residual, sensitizing monomers are washed off the developing photo-plate, and it is these residual monomers in the bath that may cause an allergic reaction in susceptible, exposed persons. Experience indicates that cured MERIGRAPH SYSTEMS photoplates are essentially non-toxic in use, provided routine industrial hygiene procedures are followed.

Continued...

V. HEALTH HAZARD DATA

REPORTED ANIMAL EFFECTS:

Hercules Incorporated has conducted toxicology testing on commercial MERIGRAPH* SYSTEMS liquid photopolymer resins. Those that have been tested have been shown to be mildly to non-irritating to the skin of rabbits. Some have caused a moderate to slight, transient eye irritation; this irritation usually cleared within 3-7 days after treatment. If the eye was washed with water immediately after administration, the irritation did not develop. The oral toxicity of a sample of a cured (polymerized) MERIGRAPH SYSTEMS resin has been examined in rats and an LD50 of greater than 7.5 g/kg was determined.

Published data on the toxicity of mono- and/or multifunctional methacrylate monomers has recently been reviewed (see: Andrews and Clary (1986) J. Toxicol. Environ. Health 19:149-164). From these data, it may be seen that, as a class, these esters should be considered to be eye and skin irritants, as well as potential skin sensitizers, but that they present little to no acute oral or dermal absorption toxicity hazard. In vitro testing of these esters has been inconclusive in that methacrylates have uniformly been negative in the Ames test, yet positive in the mouse lymphoma test. Chronic dermal assays of any methacrylate ester have not produced systemic toxicity or systemic or local tumors.

VI. SPILL PROCEDURES & WASTE DISPOSAL

SPILL PROCEDURES:

Small Spills: Add absorbent, sweep up, and discard. Large Spills: Dike to contain and pump into drums for use or disposal.

WASTE DISPOSAL METHOD:

Incineration in accordance with local, state, and federal regulations is the recommended disposal method. Resin that has been solidified by curing can be landfilled in licensed, non-hazardous waste landfills equipped with leachate collection.

This product is biodegradable. Wastewater containing this product can be considered for treatment in an acclimated biological treatment system of adequate capacity.

Refer to Section VIII for specific Federal Environmental and Regulatory Data regarding use or disposal of this product.

Continued...

VII. APPLICABLE CONTROL MEASURES

APPROPRIATE HYGIENIC PRACTICES:

Do not allow eye or skin contact.
Avoid breathing vapor and mist when developing plates.
Wash thoroughly after handling, and before eating, drinking or smoking.
Remove contaminated clothing promptly and clean thoroughly before reuse.
Discard contaminated shoes and other leather articles.

PERSONAL PROTECTIVE EQUIPMENT:

Impervious gloves
Safety glasses
Appropriate respiratory protection required when exposure to airborne contaminant is likely to exceed acceptable limits. Respirators should be selected and used in accordance with OSHA Subpart I (29 CFR 1910.134) and manufacturer's recommendations.
Appropriate protective clothing

WORK PRACTICES:

Eyewash fountains and safety showers should be easily accessible.

HANDLING AND STORAGE PRECAUTIONS:

Avoid exposure to sunlight or artificial ultraviolet light, which will cause the resin to polymerize.
This product may react with peroxides and should not be stored near such materials.
Store at temperatures below 35 C (95 F) to preserve product integrity.

ENGINEERING CONTROLS:

Adequate ventilation should be provided to keep mist and vapor concentrations below acceptable exposure limits. Discharge from the ventilation system should comply with applicable air pollution control regulations.

PROTECTIVE MEASURES DURING REPAIR AND MAINTENANCE:

Completely isolate and thoroughly clean all equipment, piping or vessels before beginning maintenance or repairs.
Keep area clean. Product will burn.

VIII. ENVIRONMENTAL REGULATORY DATA

The following environmental and regulatory data are provided to assist users of this product in defining their regulatory environmental compliance obligations.

A. PRODUCT COMPOSITION

PRODUCT (P) or COMPONENT NO.	TRADE NAME or CHEMICAL COMPONENT	CASRN	WT. PERCENT
P	MERIGRAPH* SYSTEMS GC75 Photopolymer resin	Mixture	100
1	Mono- and/or multi-functional methacrylate/acrylate monomers	N/A	10-30
2	Other ingredients	N/A	Above 1

B. SARA TITLE III (See footnotes)

COMPONENT NO.	SEC. 304 EHS RQ (lbs)	SEC. 302 EHS TPQ (lbs)	SEC. 311/312 HAZARD CATEGORY	SEC. 313 TOXIC CHEMICAL (YES, NO)
P	N/A	N/A	HC-1, NPH	N/A
1	N/A	N/A	HC-1	NO
2	N/A	N/A	HC-1	NO

C. CERCLA (40 CFR 302.4 HAZARDOUS SUBSTANCE & REPORTABLE QUANTITIES)

This product does NOT contain any hazardous substances listed in 40 CFR 302.4.

D. RCRA INFORMATION

This product is not listed in federal hazardous waste regulation 40 CFR 261.33, paragraph (e) or (f) - i.e., chemical products that are considered hazardous if they become wastes. It does not exhibit any of the hazardous characteristics listed in 40 CFR 261, Subpart C. State or local hazardous waste regulations may apply if they are different from the federal regulation.

E. TSCA STATUS

The components of this product are included on the EPA TSCA Chemical Substance Inventory.

Continued...

VIII. ENVIRONMENTAL REGULATORY DATA

...Continued

FOOTNOTES:

SEC. 302 - Threshold Planning Quantity, Extremely Hazardous Substance (EHS) (40 CFR 355 Emergency Planning and Notification regulations)

N/A: This chemical is not an EHS. Therefore, there is no Threshold Planning Quantity (TPQ).

SEC. 304 - Reportable Quantity for Releases of an EHS (40 CFR 355, Appendix A)

N/A: This chemical is not an EHS. Therefore, there is no Reportable Quantity (RQ).

SEC. 311/312 - 40 CFR 370 Hazardous Chemical Reporting Requirements "Hazard Categories"

HC-1 Immediate (acute) health hazard
HC-2 Delayed (chronic) health hazard
HC-3 Fire hazard
HC-4 Sudden release of pressure hazard
HC-5 Reactive hazard
NHH Not a health hazard
NPH Not a physical hazard

SEC. 313 - 40 CFR 372 Toxic Chemical Release Reporting Requirements

NO: This component is NOT subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372 Toxic Chemical Reporting requirements.

YES: This component is subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372 Toxic Chemical Reporting requirements. Percent composition (or estimated range) is listed above.

N/A: This product is a mixture. As such, it is not listed as a Toxic Chemical under 40 CFR 372, Section 313 reporting requirements. Reportable constituents are listed individually where they exceed threshold concentration limits.

INSPECTOR'S MULTI-MEDIA CHECKLIST

Facility Name: Squire Corrugated Container Corp.

Facility Address: 1500 Lower Road
Linden NJ 07036

Facility ID No.: NJD042027482

Inspector's Name: Bart George, Sam Karas

Inspector's Phone: _____ Division/Branch: AWM-HWC

Date of Inspection: 5-3-95

Form Revised 1/24/95

INSPECTORS' MULTI-MEDIA CHECKLIST

GENERAL VISUAL CUES OF POSSIBLE NONCOMPLIANCE WARRANTING FURTHER INQUIRY

1. Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.

2. Stains or discoloration of soil, concrete, or floors in work areas.

3. Distressed vegetation - unhealthy, discolored, or dead.

4. Dark smoke or dust clouds, or smoke coming from other than a smoke stack.

5. Unusual odors or strong chemical smells.

6. Sheen on surface waters.

CHECK IT OUT!

1. If you see or hear something suspicious during an inspection, check it out! Ask probing questions:

   - What is it? Is it a waste product?
   - What process produced it?
   - Has it been tested?
   - Where do you normally dispose of it?
   - Do you have a permit for the disposal?
   - How long has the circumstance existed?
   - When did it begin?

2. Pay attention to the situation.

   - Note amount of pollutant that appears to be involved.
   - Note the location.
   - Take notes describing the situation, noting the source of the pollutant and its emission point.
   - Take photographs.

PROGRAM-SPECIFIC QUESTIONS

Refer to program-specific questions in Attachment A appropriate for the facility you are inspecting.

REPORTING POSSIBLE NONCOMPLIANCE

Throughout this checklist, there are YES/NO questions. If you place an answer in a field marked with an asterisk (*), this means you should promptly refer the matter to the appropriate Region II program office. After you return from your inspection, immediately let your supervisor know that you observed possible noncompliance in another program area during your inspection. The information should then be referred to the appropriate Section Chief listed on Attachment B.

ATTACHMENT A - FOLLOW-UP QUESTIONS

RCRA -

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), do not complete this form but enter the facility's EPA ID number here _____.

Ask:

1. A. Has the facility determined that it generates hazardous waste? ___YES ___NO

   If **NO**, skip Questions 2 to 8 and go to Question 9. If **YES** continue:

   B. If the facility generates or transports hazardous waste, what is its EPA ID Number? _____

   [If the facility cannot produce an ID Number, ***REFER***.]

2. A. Are there containers or tanks which hold hazardous waste? ___YES ___NO

   If **NO**, go to Question # 3. If **YES**, continue:

   B. Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date? ___YES ___NO*

   C. Do hazardous waste storage tanks have secondary containment systems (i.e., berm, vault, double wall tank)? ___YES ___NO*

   D. Does the facility store hazardous waste in containers or tanks for longer than 90 days? ___YES* ___NO

3. Does the facility store, treat or dispose of hazardous waste in lagoons, pits, piles or landfills? ___YES* ___NO

4. Does the facility treat hazardous waste by incineration, precipitation, neutralization or other means to change the physical or chemical nature of the waste? ___YES* ___NO

5. Does the facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)? ___YES* ___NO

6. Does the facility maintain copies of hazardous waste manifests on-site? ___YES ___NO*

REFER to program office if you check an answer marked with *.

RCRA, Continued

7. Are there any indications that hazardous waste storage or treatment units (i.e., containers or tanks) are poorly maintained and may cause the release of hazardous waste to the environment?
___YES* ___NO

8. Are there any indications that chemicals or wastes have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges? ___YES* ___NO

9. A. Does the facility claim to generate non-hazardous process wastes (i.e., excluding office paper wastes, cafeteria wastes, etc.)? ___YES* ___NO

If NO, go to Question 10. If YES continue:

B. What type of non-hazardous wastes does the facility handle? (E.g., treatment sludges, ash, solvents, waste oils, etc.)

_____
_____
_____

C. Very briefly describe the process(es) that generate the wastes in Question 9B.

_____
_____
_____

10. Are there any indications that waste generation, handling, management or disposal practices have resulted in environmental damage or pose the threat of such damage? ___YES* ___NO

RADIATION

Ask:

1. Are any radioactive materials used or stored at this facility?
___YES ___NO

2. **If YES,** does the facility have a state or federal radiation license?
___YES ___NO*

REFER to program office if you check an answer marked with *.

UNDERGROUND STORAGE TANKS (UST)

Ask:

1. Does the facility have regulated USTs? ✓ YES ___ NO

   [A regulated UST has more than 10% of tank volume, including piping, located underground; **and** contains petroleum products or hazardous substances (as defined under CERCLA). Note: USTs containing fuel oil for on-site heating are exempt from UST requirements.]

If YES, ask:

2. Are the USTs registered with the State? ___ YES ___ NO*

   5,000 gal scheduled to be change & 95 spring

3. What kind of petroleum product or hazardous substance does UST contain? No 2 diesel

4. Is there any evidence of UST leakage/spillage? ___ YES* ___ NO

5. When was the UST installed? 20 yrs ago

6. All USTs must have leak detection according to the following schedule:

Installation Date	Leak Detection By December of--
Before 1965 or unknown	1989
1965 - 1969	1990
1970 - 1974	1991
1975 - 1979	1992
1980 - Dec. 1988	1993

   All USTs installed after December 1988 must currently be equipped with leak detection.

   Leak detection systems include monitoring wells (water or vapor), automatic tank gauging system, interstitial monitoring, manual tank gauging or inventory control plus tank tightness testing. 2 yr. ago pressure check

7. Is some form of leak detection in use for every UST required (based on above schedule) to have it? ✓ YES ___ NO*

8. Are required records available on-site (e.g., documenting registration and leak detection)? ___ YES ___ NO*

REFER to program office if you check an answer marked with *.

AIR

Stationary Source Compliance

1. **With sun <u>BEHIND</u> you, observe:** Is opaque smoke being emitted from a smokestack, vent or opening? ___YES* ___NO

   ["Opaque smoke" is smoke -- <u>not steam</u> -- dark enough to obscure anything behind the plume for five minutes or more. (Steam dissipates at a given point; smoke trails off.) The sun (if not obscured by clouds) should be in a 140° arc behind the observer. **Please note whether sun was obscured; if sun was not obscured, note the relative positions of the sun, the observer and the emission point observed.**]

2. **If YES, ask:**

   A. Which process or process line is smoke coming from? (Try to be specific, <u>e.g</u>, "Boiler No. 4" or "Coating Line C").

   _____

   B. What is the cause of the smoke emission? <u>E.g</u>.--

      i. Is any air pollution control equipment out of service or turned off while production is ongoing? ___YES ___NO

      ii. **If YES:** When will it be back on line? _____

      iii. Is the facility operating under an unusual load, using different fuels, or process feed materials? ___YES ___NO

   C. Note color of smoke: _____

3. A. Has the facility added any processes or expanded any pre-existing processes in the last two years? ___YES ___NO

   B. **If YES:** Did the facility obtain any state or federal air pollution permits for the expansion? ___YES ___NO*

4. A. Does the facility have any coating or printing operations? ___YES ___NO

   B. **If YES:**

      ii. Are the coatings or inks used: ___water-based or ___solvent-based?

      i. If solvent based, are all process lines controlled, or are coating formulations in use which comply with applicable limits? NA ___YES ___NO*

      iii. What are the principal solvents or chemical compounds used in process lines? NA
      (Ask for copies of MSDS, if available.)

REFER to program office if you check an answer marked with *.

AIR, Continued

5. **Observe:** Are there strong solvent odors at the facility? ___YES ___NO

7. Does the facility emit any of the following pollutants: mercury, beryllium, lead or asbestos? ___YES* ___NO

8. A. Does the facility emit, or use in its processes, vinyl chloride or benzene? ___YES* ___NO

   B. **If YES:**

      i. From which process lines?. _____

      ii. Does the facility check for leaks on such process equipment? ___YES ___NO*

9. A. Has the facility undergone any renovations or demolitions during the last 18 months which involved the removal or disturbance of asbestos-containing materials? ___YES ✓NO
   No asbestos in building

   If YES:

   B. Approximately how many square feet or linear feet of asbestos-containing materials were removed? _____

   C. If the amount exceeded 260 linear feet, or 160 square feet, ***REFER*** to Air program office; and **Ask:** was EPA notified of removal? ___YES ___NO*

CFC MULTI-MEDIA CHECKLIST QUESTIONS

Motor Vehicle Air Conditioning Recovery/Recycling Compliance Program

1. A. Does the facility perform servicing for motor vehicle air conditioners? ____YES ✓____NO

   B. **If YES:**

      i. Does facility have Recover/Recycle or Recovery only equipment? ____YES ____NO*

Prohibition on venting

2. A. Does the facility have any air conditioning/ refrigeration equipment or industrial compressors, which their employees perform service on (i.e. maintaining, servicing, repairing, or disposing of equipment) involving the refrigerant? ____YES ✓____NO

   B. **If YES:**
      i. Does facility have Recovery/Recycle or Recovery only equipment? ____YES ____NO*

REFER to program office if you check an answer marked with *.

WATER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) And PRE-TREATMENT/UNDERGROUND INJECTION CONTROL (UIC)

1. **Observe/Ask:** Does the facility dispose of any wastewater (e.g., from its manufacturing processes, wash water or other industrial wastes)? water based ww. goes to sister facility ✓YES ___NO

2. **If yes:** Does the facility discharge wastewater into a--

   - receiving stream? ___YES ✓NO
   - municipal sewer (sanitary or storm) system? ✓YES ___NO
   - subsurface disposal system (septic system, drywell or cesspool)? ___YES ✓NO

   As applicable, ascertain the name of the stream or sewer system.

3. An NPDES permit is required for discharge to a waterbody; a pretreatment permit is usually issued by the municipality authorizing the discharge to a sanitary sewer system; and a UIC permit is required for subsurface disposal. Does the facility have a permit for each discharge? ___YES ___NO* due to discharge amount no permit necessy per local authority.

4. Does the facility treat wastewater prior to discharge? ___YES ~~✓~~ ✓NO

5. **Observe:** Effluent not observed.

   a. Is the effluent from the wastewater treatment facilities clear and free of solids? ___YES ___NO*

   b. Is equipment clean and well maintained? ___YES ___NO*

   c. Are there any unusual odors? ___YES* ___NO

6. **Ask:** Is the effluent currently in compliance with the limitations established in the permit, or the terms of an administrative or judicial compliance order? ___YES ___NO*

7. **Observe/Ask:**

   a. How are waste fluids disposed of?

   b. Does the facility have floor or storm drains? ✓YES ___NO

REFER to program office if you check an answer marked with *.

NPDES and UIC, Continued

If YES:

Is there fluid in the drains? Is there evidence (staining, etc.) of fluid entering drains? Are storm drains situated so that they could receive spills from truck loading accidents, etc? No.

c. Does the facility operator indicate, or is there any evidence that any wastewater, or wastes/spills go into drains?
___YES* ___/NO

B. STORM WATER

1. Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water. _____ If yes ---
a) Is the storm water conveyed to a (1) treatment facility, (2) combined sewer, (3) separate storm sewer, or (4) surface water?
stormwater from roofs/driveway goes to municipal sewer

2. Are the storm water discharges covered by a permit or has the discharger applied for a permit? yes

3. Are materials stored outside? No If yes ----
a) Are materials (1) stored in sealed containers, under tarps or roofs, or (2) are they open to contact with precipitation? _____ (b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff? _____.

PUBLIC WATER SUPPLY

1. **Observe/Ask:** Does the facility have its own water supply (i.e., a well)?
___YES ___/NO

2. **If YES:** Does the facility provide potable water for 25 or more persons?
___YES ___NO

3. **If YES:** Is the facility sampling and analyzing for contaminants in its water supply and reporting the results to the state?
___YES ___NO*

REFER to program office if you check an answer marked with *.

EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW ACT (EPCRA)

EMERGENCY PLANNING and COMMUNITY RIGHT TO KNOW

ASK:

1. A. Does the facility have present any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities? ✓YES ___NO

   [Threshold planning quantities are established by regulation, vary by chemical, and range from 1 lb. to 5000 lbs.]

   B. **If YES:** Was the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) notified of their presence for local planning purposes? ✓YES ___NO*

2. A. Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity? ___YES* ✓NO

   [Reportable quantities vary by substance, ranging from 1 lb. to 5000 lbs. For the purpose of this checklist, assume 1 lb.]

   B. **If YES:** Was notification of the release provided? ___YES ___NO*

   C. **If YES:**

   i. To whom was the notification given?

   ii. Was notification oral or written?

   iii. If oral, was a written, follow-up report submitted? ___YES ___NO*

   [If facility cannot identify to whom notification was given, cannot specify whether notification was written or oral, or is not certain whether oral notification was followed by a written follow-up report, ***REFER***.]

3. A. Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard? ✓YES ___NO*

   B. If any hazardous chemicals are present in excess of 10,000 lbs., or Extremely Hazardous Substances are present in excess of the threshold planning quantities, have the MSDS (or a list of MSDS), along with chemical inventory forms, been submitted to state and local emergency planning authorities and the local fire department? NA ___YES ___NO*

REFER to program office if you check an answer marked with *.

EPCRA, Continued

TOXIC RELEASE INVENTORY (TRI)

Ask:

1. Does the facility have 10 or more full-time employees?
   ___YES ___NO

2. Is the facility classified under SIC codes 20 through 39?
   2653
   ___YES ___NO

   If the response to either 1. or 2. is "NO," no further questions are required.

3. **If both 1. and 2. are YES:**

   Did the facility use more than 10,000 lbs. of a chemical during a previous calendar year (starting with 1987). ___YES ___NO

4. **If YES:**

   Did the facility file a Section 313 Toxic Chemical Release Inventory Form R for the chemical? ___YES ___NO*

For more EPCRA information, call 1-800-535-0202; or the Region II program offices for EPCRA-Emergency Planning and Community Right To Know at 908-321-6194 or for EPCRA-Toxic Release Inventory at 908-906-6890.

REFER to program office if you check an answer marked with *.

TOXIC SUBSTANCES CONTROL ACT (TSCA)

Ask:

1. A. Does the facility use electrical equipment that contains polychlorinated biphenyls (PCBs) (excluding small capacitors and florescent light ballasts)? ___YES* ___NO

   B. **IF YES:**

   i. How many oil filled electrical transformers does the facility have?

   ii. How many PCB Transformers does the facility have (transformers which contain PCBs at concentrations of 500 ppm or greater)?

2. A. Does the facility have any high temperature hydraulic systems? ___YES ___NO

   B. **If YES:**

   i. Have PCBs ever been used in these systems? ___YES* ___NO

   ii. What is the current PCB concentration in these systems?

3. A. Does the facility have any oil filled heat transfer systems? ___YES ___NO

   B. **If YES:**

   i. Have PCBs ever been used in these systems? ___YES* ___NO

   ii. What is the current PCB concentration in these systems?

4. A. **OBSERVE** PCB Items (transformers, capacitors, containers)

   - Are any leaking? ___YES* ___NO
   - Do all have a PCB label? ___YES ___NO*

5. A. **ASK:** Does the facility have a PCB storage for disposal area? ___YES* ___NO

   B. **If YES, OBSERVE** the PCB storage area. Does it have --

   - PCBs stored for disposal in it? ___YES* ___NO
   - a roof and walls to keep out rain? ___YES ___NO*
   - a 6" high impervious containment berm? ___YES ___NO*
   - a PCB label? ___YES ___NO*
   - Is it in the 100-year flood plain? ___YES* ___NO
   - Do all items show the date "removed from service for disposal"? ___YES ___NO*

REFER to program office if you check an answer marked with *.

TSCA, Continued

6. **ASK:** Does the facility manufacture or import into the United States "new commercial chemicals" [i.e., chemicals which were not previously manufactured in or imported into the United States]?
___YES* ___NO

[Note: Specific information on such chemicals is protected by TSCA as Confidential Business Information, and should not be obtained.]

For further TSCA information, call the TSCA Assistance Office in Washington at 202-554-1404 or the Region II TSCA program office at 908-321-6759.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC)

40 CFR Part 112.1-112.7

Ask:

1. A. Does the facility store oil? only in 55gal drums 2-3 on-site ___YES ___NO

[Note: Oil is not limited to petroleum oil; for example, vegetable oil and transformer oil are regulated oils.]

B. **If YES**, does the storage capacity exceed --

i. 660 gallons in any one above-ground tank? ___YES* ___NO
ii. 1320 gallons in all above-ground tanks? ___YES* ___NO
iii. 42,000 gallons in underground tank(s)? ___YES* ___NO

2. If the answer to any part of #1. B. was **YES**, did the facility show you a copy, or have available a Spill Prevention, Control, and Countermeasure (SPCC) Plan?
___YES ___NO*

3. Did the facility have an oil spill within the last 12 months?
___YES* ___NO

Facility Response Plan (FRP)

40 CFR Part 112

1) Does the facility have an oil storage capacity that is greater than or equal to 42,000 gallons and conduct operations that include over-water transfers of oil to or from vessels?

___ Yes* ___ No

REFER to program office if you check an answer marked with *.

2) Does the facility have an oil storage capacity greater than or equal to one million gallons?

___ Yes* ___ No

3) Did the facility submit a Facility Response Plan to the EPA?

___ Yes ___ No

WETLANDS

1. **Observe:**

   A. Are there any wet areas (i.e., marshes, swamps, bogs) on or adjacent to the site, with or without wetlands-type vegetation such as cattails, rushes, or sedges? ___YES ___NO

   [Sketches of several common wetlands plants are attached. Note that there need not be standing water in order for an area to be designated a federal wetland; and some wetlands have shrubs and trees present.]

   B. Are there any waterbodies or waterways on or adjacent to the site? ___YES ___NO

2. If answer to # 1. A or B was "YES," is there any work (clearing, filling, dredging, ditching, construction on or over the area, etc.) being conducted in these areas, or is there any evidence that such activities have occurred very recently? ___YES ___NO

3. **If YES:**

   A. When was the work undertaken? _____

   B. Does the facility have any permits for this work? ___YES ___NO*

4. **If YES:**

   A. What agency(s) issued such permits? _____ (E.g., U.S. Army Corps of Engineers; State environmental agency.)

   B. For any federal permits, what specific type of permits are they (i.e., nationwide, regional, individual)? _____

   _____

If facility is unable to provide adequate information in response to # 4., *REFER* to program office.

REFER to program office if you check an answer marked with *.

FEDERAL INSECTICIDE, FUNGICIDE AND RODENTICIDE ACT

FIFRA

If the inspection is conducted at a manufacturing facility, ask the following:

1. A. Are there any pesticides manufactured, relabeled, or repackaged at this establishment?

___ YES ___/ NO

(Pesticide is (1) any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or (2) any substance or mixture of substances intended for use as a plant regulator, defoliant, or desiccant.)

B. If **YES**, continue:

Does the establishment have an EPA Establishment Number? (EPA EST. #)

___ YES ___ NO*

(Section 7 of FIFRA requires all establishments producing, relabeling and/or repackaging pesticides be registered with EPA.)

C. If **Yes**, enter the Establishment Number here _____ and continue:

D. Has the company filed the Annual Pesticide Production Report form?

___ YES ___ NO*

(Report is due on March 2 of each year for the previous year's production.)

If the inspection is conducted at a storage-distribution facility or at a retail facility, ask the following:

2. A. Are there any pesticides being held for sale, distribution, or stored at this facility (warehouse)?

___ YES ___/ NO

B. If **YES**, continue:

Are there any restricted use pesticides stored, or held for distribution, sale at this facility?

___ YES ___/ NO

C. Are there any containers leaking?

___ YES* ___ NO

D. Are pesticides stored next to strong acids, mineral acids, caustic and/or oxidizing materials?

___ YES* ___ NO

If the inspection is conducted at a site where there is a suspicion/indication that pesticides were not properly used, observe and record any visible adverse effects such as human adverse reaction(s), fish kill, dead birds, dead wildlife, plant damage, etc, and ask the following:

3. A. Have pesticides been applied by you (or by an employee of your company or by a pesticide application company?

___/ YES* ___ NO

B. If **YES**, continue obtaining the following information:

- Date of application, – 2/mo.
- Name of pesticide applied, see ref number below
- Name of pesticide applicator company (if applicable) or person in your company who made the application,
- Address and/or phone number of pesticide applicator company (if applicable),
- Type of health complaints from employee (if applicable),
- Contact person for follow-up.

~~Terminix, or~~ Western Watch Dog
Non-toxic unit. i.e. roach motel type unit

EPA Est# 54531NY001

REFER to Program Office if you check an answer marked with *.

908-233-4100
Mountainside
Western Pest Control

CRIMINAL ACTS

During the course of this inspection, has anything been brought to your attention which would indicate the following:

1. Is the facility involved in deliberate acts of dumping or discharging wastes?

   _____ Yes* _____ No

2. Is there any evidence of bad intent or conduct? For example, falsification or records or efforts to conceal activities?

   _____ Yes* _____ No

3. Has there been any actual harm to individuals as a result of violations?

   _____ Yes* _____ No

4. Other activity or behavior which you believe indicates criminal behavior?

   _____ Yes* _____ No

Refer to Criminal Investigation Division if you checked Yes.

Attachment B

REGION II MEDIA PROGRAM SECTION CHIEFS (and Alternate Contacts)

RCRA: Joel Golumbek (NJ, Caribbean), 637-4140
John Gorman (NY), 637-4150

AIR (Except Asbestos): (Including CFC) Karl Mangels (NY), 637-4078
Jehuda Menczel (NJ, Caribbean), 637-4045

AIR/ASBESTOS: Robert Fitzpatrick, 637-4042

UST: Dit Fai Cheung, 637-4124

TSCA: Dan Kraft, 908-321-6669
Dave Greenlaw, 908-906-6817

EPCRA: For Toxic Release Inventory: Dan Kraft, 908-321-6669
Nora Lopez, 908-906-6890

For Emergency Planning & Community Right-to-Know:
John Higgins, 908-906-6194

SPCC/FRP: Doug Kodama, 908-906-6905

Federal Facilities: Laura Livingston, 637-3494

NPDES and Pretreatment: John Kushwara, 637-3762

UIC: Frank Brock, 637-3875

Public Water Supply: Robert Williams, 637-3879

Wetlands: Daniel Montella, 637-3801

Removal Actions: Richard Salkie, 908-321-6658
Bruce Sprague, 908-321-6656
John Witkowski, 908-321-6991

Radiation: Michael Buccigrossi, 637-4008

FIFRA: Fred Kozak, 908-321-6769

Criminal Investigations Division - William V. Lometti: 637-3634

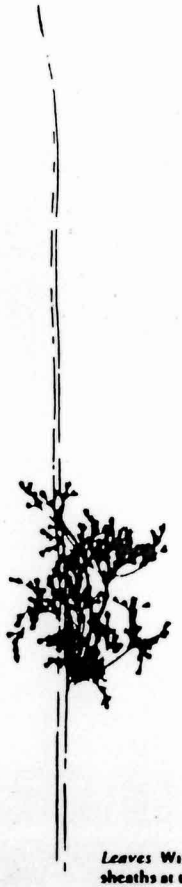
Section Chiefs should contact their appropriate counterpart(s) on the above list concerning potential violations noted on the checklist or otherwise.

Scirpus cyperinus (L.) Kunth
Wool grass or Woolly Sedge

Range Newfoundland to Saskatchewan, south to North Carolina and Oklahoma
Habitat Marshes, wet meadows, and ditches
General characteristics Plants up to 5 feet tall, growing in small groups, stem with long, narrow, rigid leaves, flowers crowded into small, oval, woolly spikelets in loose, drooping clusters at the tip of the stem
Stem Upright, bluntly triangular, up to ¼ inch thick, from a fibrous rooted base
Leaves Stem leaves up to 16 inches long and ¼ inch wide, those immediately below the flower clusters three to five, sheaths closed except at summit
Inflorescence Flowers inconspicuous in the axils of the overlapping scales of the brownish spikelets, spikelets in clusters of six to twelve at the ends of long, somewhat drooping branches, flower cluster up to 12 inches long, much-branched, flowering during August–September
Fruit A whitish, seed like nutlet with bristles much longer than the scales attached to the base, the bristles impart the woolly appearance to the spikelets

Carex lurida Wahlenb
Sedge

Range Nova Scotia to Minnesota, south to Florida and Mexico.
Habitat Wet meadows, marshes, ditches, edges of pools and ponds.
General characteristics Plants up to 3 feet tall, generally growing in dense clumps, stems bearing several long, narrow leaves with rough surfaces, male and female flowers in separate spikes, the latter in the axils of the uppermost leaves
Stem Sharply three angled and smooth, from a fibrous rooted base
Leaves Up to 10 inches long and ¼-inch wide, those immediately below the flower clusters resembling the stem leaves, leaf sheath with a ligule at the junction of the blade, closed except at summit
Inflorescence Flowers in the axils of scales with long tips and aggregated in spikes, the male spike single, erect at the top of the stem, soon withering, female spikes two to four, thick-cylindrical, up to 2½ inches long and ⅝-inch thick, sessile or short-stalked, erect or somewhat drooping, very densely flowered, flowering during June–July
Fruit A brown, seed like nutlet enclosed in an inflated sac (the perigynium)



JUNCACEAE
Rush Family
Juncus effusus L.
Soft Rush

Range Throughout southern Canada and the United States
Habitat Wet meadows, marshes, edges of ponds and bogs, shallow water
General characteristics Grass-like plants up to 5 feet tall, apparently leafless, in tussocks of up to several hundred stems, flowers in loose clusters borne on the side of the stem up to one third of the way down from the tip
Stem Upright, soft and green, finely striate, arising from a stout rhizome hidden among the tussocks
Leaves Without blades, represented by sheaths at the base of the stem
Inflorescence Flowers small and greenish to brown with three scale-like, pointed sepals and three similar petals, numerous, flower clusters with many forking branches of variable lengths, the flowers at the tips of the smaller branches, flowering during July–August
Fruit A brownish capsule with three partitions containing many seeds
Commonly confused species *Scirpus* spp. (Bulrushes), rushes may be distinguished from bulrushes by the fact that the fruits consist of capsules in the former group and nutlets in the axils of spikelet scales in the latter group

Several Common Wetlands Plants from Freshwater Wetlands: A Guide to Common Indicator Plants of the Northeast, Univ. of Mass. Press, 1981

J.M. HUBER

MATERIAL SAFETY DATA SHEET

Information contained in this form is proprietary and is furnished solely for the use of our customers. The information is believed to be reliable. No guarantee is implied or expressed regarding the accuracy of this information or the use of the product since the conditions for use are beyond our control. Nothing contained herein should be construed as a recommendation to use this product in conflict with existing patents covering any material or its use.

SECTION I: IDENTIFICATION

Trade Name: WATER-BASED FLEXOGRAPHIC INK - HUBERFLEX & HUBERLENE

Group Name: 150SERIES

Manufacturer: J. M. HUBER CORPORATION
Ink Division
Address: 333 Thornall St
City, State, Zip: Edison, NJ 08818
Telephone Number: 908-906-1760

Additional Information:
Water-based Flexographic Ink
Huberflex & Huberlene

SECTION II: HAZARDOUS INGREDIENTS

INGREDIENTS: CAS # Min-LIMITS (%)-Max

HAZARD DATA: Agency Test Concentration

Additional Information:
No hazardous ingredients according to OSHA Hazard Communication Standard, 29 CFR 1910-1200

SECTION III: PHYSICAL CHARACTERISTICS

PHYSICAL DATA:		QTY	UNITS	TEXT
Boiling Point:	>	200	DEG F	

Solubility Data: Miscible in water.

Appearance and Odor:
Thin liquid - Sweet

Additional Information:
VAPAOR DENSITY: Heavier vs. air.
LIQUID DENSITY: Heavier vs. water.
EVAPORATION RATE: Slower vs. Butyl Acetate.

SECTION IV: FIRE & EXPLOSION HAZARDS

(Flammability Classification)

Extinguishing Media:
Foam; "Alcohol" Foam; C02; Dry Chemical; Water Fog

Unusual Fire and Explosion Hazards:
None

Special Firefighting Procedures:
None

Additional Information:
IIIB/ Exempt
DOT: Non-hazardous

SECTION V: HEALTH HAZARD DATA

Primary Routes of Entry:
Dermal

Effects of Overexposure:

Skin-
Prolonged or repeated skin contact may cause irritation or dermatitis.

Eye-
Direct contact with eyes can cause irritation.

Ingestion-
Ingestion may cause nausea or intestinal pain.

Medical Conditions Aggravated by Exposure:
None known.

Emergency and First Aid Procedures:

Skin-
Wash thoroughly with warm water and soap.

Eye-
Flush eyes with steady stream of water for 15 minutes.
If irritation persists, seek medical aid.

Ingestion-
Get medical attention.

SECTION VI: REACTIVITY DATA

Reactivity Classification: STABLE

Conditions to Avoid:
Avoid contact with strong acids, alkalies or oxidizers.

SECTION VII: PRECAUTIONS FOR SAFE HANDLING AND USE

Procedure when Material is Released or Spilled:
Stop discharge and contain spill or contaminated material using dike, barrier or other means. Absorb material with sorbent, vermiculite or other means. Place in suitable containers for disposal.

Waste Disposal Method:
Dispose in accordance with local, state and federal regulations.

Precautions to be Taken in Handling and Storing:
For personal hygiene protection wash thoroughly after handling product
NFPA Class IIIB storage.

SECTION VIII: SPECIAL PROTECTION INFORMATION

Ventilation:
Local exhaust recommended.

Personal Protective Equipment:
PROTECTIVE GLOVES: Chemical resistant gloves.
RESPIRATORY PROTECTION: None typically required.
EYE PROTECTION: Splash-proof chemical goggles during pouring and dispensing.

SECTION IX: SPECIAL PRECAUTIONS

OSHA / HMIS LABEL

HEALTH 0
FLAMMABILITY 0
REACTIVITY 0

LABEL CODE: 0 - Minimal ; 1 - Slight ; 2 - Moderate
3 - Serious ; 4 - Severe

Additional Regulatory Concerns:

OSHA
Has this product or any of its ingredients in concentrations above 0.1% been reported as a carcinogen in:

NTP? NO IARC Monographs? NO OSHA Regulations? NO

Date MSDS Created: 14-FEB-91 **Prepared by: ROBERT H. MESSING**
Phone: 908-906-1760

Date Last Revised: 14-FEB-91

J.M. HUBER CORPORATION
INK DIVISION
RARITAN CENTER
PERSHING AVE
EDISON, NJ 08837

05/29/92

SQUIRE CORRUGATED CONT. CORP.
1500 LOWER ROAD
LINDEN, NJ 07036

Re: Invoice Number- H381591
Customer Number- 8080100

Dear Customer:

In accordance with Section 313 of the EPA's SARA Title III, we are required to notify you, with the first shipment of each year, the percentage of any chemical which is subject to the reporting reqirments of Section 313 and which may be present in our printing inks.

We are therefore notifying you that the inks you have purchased from J.M. Huber contain the following amounts of Section 313 chemicals.

INK NAME	HUBER CODE	SECTION 313 CHEMICAL %
K/S 485U (IR) RED	618R77310	4.42 DI-(2-ETHYLHEXYL) PHTHA
		26.36 ETHYLENE GLYCOL
K/S ROLLER COMPOUND	991KV6	30.00 ETHYLENE GLYCOL

Users of products containing Section 313 listed chemicals will be required to report releases of these chemicals to the EPA if they processed more than 25,000 pounds or otherwise used more than 10,000 pounds of listed chemicals during a calendar year.

If you have questions concerning the ink products or reporting requirements please contact Robert Messing at our Edison, NJ location: (908) 906-1760.

S & W WASTE, INC.

115 Jacobus Avenue, South Kearny, NJ 07032
(201) 344-4004

Use Ball Point Pen - Press Firmly

APPROVAL CODE 001
CUSTOMER # 014065
LSR #
TECHNICAL REP. INITIALS JP
APPROVAL DATE
BROKER NAME (IF APPLICABLE):

A. GENERATOR INFORMATION

GENERATORS NAME Squire Corrugated Container Corp.
MAILING ADDRESS
WASTE PICK-UP ADDRESS 1500 Lower Road Linden, NJ 07036 EPA ID NO. NJD042027482
TECH CONTACT Nick Canale TECH CONTACT PHONE # (908) 8629111 M.S.D.S. Attached YES ___ NO ✓
COMMON NAME OF WASTE Non-hazardous ink sludge
PROCESS GENERATING WASTE Production and Printing Process for corrugated boxes - Collection of non-haz inks off of presses before changing colors. Not a formulation process or the result of cleanup using solvents
IS THIS WASTE FROM A PLANT CLOSURE OR PLANT CLEAN UP? YES ___ NO X

B. PHYSICAL/CHEMICAL CHARACTERISITICS

ODOR
___ NONE
X MILD
___ STRONG
___ DESCRIBE
COLOR:

PHYSICAL STATE @ 70°F
Y SOLID
Y LIQUID
___ POWDER
___ SEMI-SOLID
___ SINGLE PHASE
X BI-LAYERED
___ MULTI-LAYERED

FLASH POINT (F/C.C.) LIQUIDS
___ <100 ACTUAL
___ 100-140
___ >140-200
X >200
IGNITABILITY (SOLIDS)
___ YES X NO

CORROSIVITY(pH)
___ ≤ 2.0
___ > 2.01-5
X > 5.01-9
___ > 9.01-12.49
___ ≥ 12.50
EXACT pH

PERCENT LIQUID/SOLID
TOTAL SOLIDS <40 %
SUSPENDED SOLIDS ___ %
FREE LIQUIDS >10 %
WATER ___ %

SPECIFIC GRAVITY
___ <.8 ___ >1.0-1.2
___ .8-1 ___ > 1.2

REACTIVITY (PPM)
TOTAL CYANIDES ND
AMENABLE CYANIDES ND
REACTIVE SULFIDES ND
___ WATER REACTIVE
___ AIR REACTIVE
___ SHOCK SENSITIVE
___ GENERATES TOXIC FUMES when mixed with H2O, acid or base

FUELS/SOLVENTS
BTU/LB None
%HALOGEN 0.00
%ASH
%SULFUR
%BS&W

AQUEOUS
TOTAL ORGANIC CARBON
___ < 1,000 mg/l
___ < 10,000 mg/l
___ < 25,000 mg/l
___ < 50,000 mg/l
X < 100,000 mg/l
EXACT 53,700

C. CHEMICAL COMPOSITION

	RANGE MIN.–MAX.
Aqueous Liquid	10 %
Bottom Ink Sludge	90 %
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
	%
TOTAL	100 %

PLEASE NOTE THE CHEMICAL COMPOSITION TOTAL IN THE MAXIMUM COLUMN MUST BE GREATER THAN OR EQUAL TO 100 PERCENT.

D. TOXICITY CHARACTERISTIC

Contaminant	EPA HW No.1	Regulatory Level (mg/L)	Less* Than Regulated Level	Actual Level
Arsenic	D004	5.0	BRL	<0.11
Barium	D005	100.0		0.5
Cadmium	D006	1.0		<0.1
Chromium	D007	5.0		<0.1
Lead	D008	5.0		0.1
Mercury	D009	0.2		<0.0
Selenium	D010	1.0		0.4
Silver	D011	5.0		<0.1
Benzene	D018	0.5		
Carbon tetrachloride	D019	0.5		
Chlordane	D020	0.03		
Chlorobenzene.	D021	100.0		
Chloroform	D022	6.0		
o-Cresol	D023	[3]200.0		
m-Cresol	D024	[3]200.0		
p-Cresol	D025	[3]200.0		
Cresol	D026	[3]200.0		
2,4- D	D016	10.0		
1,4- Dichlorobenzene	D027	7.5		
1,2- Dichloroethane	D028	0.5		
1,1-Dichloroethylene	D029	0.7		
2,4-Dinitrotoluene	D030	[2]0.13		
Endrin	D012	0.02		
Heptachlor (and its hydroxide).	D031	0.008		
Hexachlorobenzene	D032	[2]0.13		
Hexachlorobutadiene.	D033	0.5		
Hexachloroethane,	D034	3.0		
Lindane	D013	0.4		
Methoxychlor..	D014	10.0		
Methyl ethyl ketone	D035	200.0		
Nitrobenzene..	D036	2.0		
Pentachlorophenol	D037	100.0		
Pyridine	D038	[2]5.0		
Tetrachloroethylene	D039	0.7		
Toxaphene	D015	0.5		
Trichloroethylene.-	D040	0.5		
2,4,5-Trichlorophenol.	D041	400.0		
2,4,6-Trichlorophenol.	D042	2.0		
2,4,5-TP (Silvex).	D017	1.0		
Vinyl chloride	D043	0.2	BRL	

[1] Hazardous waste number.
[2] Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.
[3] If o-$_1$ m-$_2$ and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total Cresol is 200 mg/L.

* Place a check in this box if contaminant is present at less than the regulated level.

HAZARDOUS CHARACTERISTICS

_ RADIOACTIVE
_ INFECTIOUS
_ TOXIC
_ EXPLOSIVE
_ PYROPHORIC
_ OXIDIZER
__ COMPRESSED GAS
__ FLAMMABLE SOLID
__ ORGANIC PEROXIDE
__ REACTIVE
__ SHOCK SENSITIVE
__ REACTIVE METALS (SPECIFY IN SECTION D)

_ OTHER DESCRIBE _____

__X__ NONE OF THE ABOVE

SHIPPING INFORMATION

_ BULK LIQUID
_ BULK SLUDGE
_ OTHER
DESCRIBE _____
__ BULK SOLID
__ DRUMS (POLY)
__X DRUMS (STEEL)

SHIPPING FREQUENCY
QUANTITY _____ PER 6 (55)

F. IDENTIFY THE HEALTH HAZARD CHARACTERISTICS FROM THE TABLE BELOW:

1. IMMEDIATE (ACUTE) HEALTH HAZARD
__X NONE
__ HIGHLY TOXIC
__ TOXIC
__ IRRITANT
__ SENSITIZER
__ CORROSIVE
__ OTHER HAZARDOUS CHEMICALS WITH AN ADVERSE EFFECT ON A TARGET ORGAN THAT GENERALLY OCCURS RAPIDLY AS A RESULT OF SHORT TERM EXPOSURE AND WITH A SHORT DURATION.

DELAYED (CHRONIC) HEALTH HAZARD:
__ CARCINOGENS*
__ OTHER HAZARDOUS CHEMICALS WITH AN ADVERSE EFFECT ON A TARGET ORGAN THAT GENERALLY OCCURS AS A RESULT OF LONG TERM EXPOSURE AND WITH A LONG DURATION.

2. IDENTIFY WHAT EXTREMELY HAZARDOUS SUBSTANCE(S)/COMPONENT(S) AS DEFINED IN SARA TITLE III. SECTION 355 IS IN THE WASTE STREAM, ITS PERCENTAGE AND WEIGHT.
__X NONE SUBSTANCE (LIST PERCENTAGES IN SECTION C)

3. IDENTIFY ANY TOXIC/HAZARDOUS (OSHA 1910.1000 SUBPART Z) REGULATED SUBSTANCES IN THE WASTE STREAM. LIST SUBSTANCES AND PERCENTAGE.
__X NONE SUBSTANCE (LIST PERCENTAGES IN SECTION C)

*If Carcinogens are known to be in waste specify the carcinogenic substance in Section C.

MANIFEST INFORMATION

IS THIS A D.O.T. HAZARDOUS MATERIAL? __ YES __X NO
PROPER D.O.T. SHIPPING NAME (Table 172.101 49 CFR) Non-Regulated Material RQ UNITS(lb/kg)_____
D.O.T. HAZARD CLASS/DIVISION: _____ UN/NA _____ PACKAGING GROUP (CIRCLE ONE) I II III
ADDITIONAL DESCRIPTIONS REQUIREMENTS (49 CFR 172.203) _____
EMERGENCY RESPONSE TELEPHONE NUMBER (172.604) (908) 562-9111 CONTACT (Print Name) NICK CANALE

WASTE CHARACTERISTICS

1) IS THIS A USEPA HAZARDOUS WASTE? __ YES __X NO, US EPA WASE NUMBER(S) _____ HAZARD CODES _____
2) STATE HAZARDOUS WASTE NUMBER(S) _____ HAZARD CODES _____
3) NJ DEPE NON-HAZARDOUS WASTE NUMBER(S) ID 72
4) DOES THIS WASTE CONTAIN ANY PCB'S __ YES __X NO IF YES INDICATE LEVEL _____
5) DOES THIS WASTE CONTAIN ANY HERBICIDES, PESTICIDES, DIOXIN OR RESIDUES THEREOF __ YES __X NO If yes, list compound and concentration in Section C.
6) IS THIS WASTE PROHIBITED FROM LAND DISPOSAL UNDER 40 CFR PART 268 __ YES __X NO
If yes list waste subcategory description if applicable _____ or check none. __ NONE
7) IS WASTE A (CHECK ONE): __X NON-WASTEWATER __ WASTEWATER (SEE 40 CFR 268.2)
8) IS THIS WASTE SUBJECT TO ANY CALIFORNIA LIST RESTRICTIONS? __ YES __X NO
If yes, check all applicable restrictions __ HOC'S __ PCB'S __ NICKEL ≥ 134 mg/L __ THALLIUM ≥ 130 mg/L
9) BENZENE NESHAP APPLICABILITY: Is this waste stream subject to management under National Emission Standards for Benzene Waste Operations as provided in 40 CFR Part 61, Subpart FF?
__ YES __X NO If YES, give BENZENE Concentration: _____
10) DOES THIS WASTE CONTAIN ANY N-NITROSO-N-METHYLUREA? __ YES __X NO If YES, Concentration: _____
11) WAS THE INFORMATION ON THIS WPS BASED ON GENERATORS KNOWLEDGE _____ OR ACTUAL CHEMICAL ANALYSIS X
12) ARE THERE ANY SPECIAL HANDLING INSTRUCTIONS FOR THE DISPOSAL OF THIS WASTE? __ YES __X NO If YES, Specify: _____

VIRGIN PETROLEUM CONTAMINATED SOIL AND MEDIA CERTIFICATION

I HEREBY CERTIFY THAT VIRGIN PETROLEUM PRODUCTS ARE THE ONLY SOURCE OF CONTAMINATION FOR THE WASTE STREAM DESCRIBED ON THIS WASTE PROFILE SHEET. BASED ON MY KNOWLEDGE AS GENERATOR; THIS MATERIAL DOES NOT EXCEED THE REGULATORY LEVELS FOR THE TOXICITY CHARACTERISTICS.

SIGNATURE Nicholas A Canale

AUTHORIZATION TO CORRECT WMPS

I AUTHORIZE S&W WASTE INC. TO MAKE CORRECTIONS TO THIS WMPS. CORRECTIONS MUST BE CONSISTENT WITH THE RESULTS OF SAMPLE ANALYSIS AND REGULATORY REQUIREMENTS. I UNDERSTAND THAT A CORRECTED COPY OF THE WMPS WILL BE SENT TO ME.

SIGNATURE Nicholas A Canale

SPECIAL HANDLING COMMENTS

M. OFFICIAL USE ONLY

QA

APPROVAL COMMITTEE

	INITIALS	DATE
ENV.	DR	6/17/94
OPS.		
TECH.	MAC	5/5/94
QA/SC		

POLYCHLORINATED BIPHENYL (PCB)/HERBICIDE, PESTICIDE, INSECTICIDE/ALUMINUM AND REACTIVE METAL WARRANTY

I hereby warrant that the material transferred to S&W WASTE INC., for transportation, treatment, storage and/or disposal is not radioactive waste and is not contaminated by either POLYCHLORINATED BIPHENYL (PCB) or HERBICIDE/INSECTICIDE/PESTICIDE or Dioxins or Furans of any value unless it is listed in Section C and approved by S&W WASTE, INC., nor does it contain Elemental Aluminum or Reactive Metal Paste, Powder or Pigment unless it is listed in Section C and approved by S&W WASTE, INC. and hereby agree to indemnify and hold S&W WASTE, INC., harmless from any costs, damages or other liability resulting from breach of this warranty or any other terms and conditions of this Waste Material Profile Sheet.

The information on this Waste Material Profile Sheet (WMPS) may have been prepared by other individuals. By signing Section O of this WMPS I certify that all information, including any attached information, is complete and is an accurate representation of the waste and its known or suspected hazards.

5/5/94 Nicholas A Canale / Plant Manager Nicholas A Canale
DATE PRINT NAME/TITLE GENERATOR'S SIGNATURE

S&W WASTE, INC. has all the appropriate permits for and will accept the waste that has been characterized/identified by this Approved WMP Sheet.

COPY # 2 → S&W CUSTOMER SERVICE COPY ← DO NOT DETACH

State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

EMERGENCY CONTACT: 708-562-7111

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-9

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. N J D 0 4 2 0 2 7 4 8 2 Manifest Document No. 3 6 5 6 5
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
SQUIRE CORRUGATED CORP. ATT:NICK CANALE
1500 LOWER ROAD LINDEN NJ 07036
4. Generator's Phone (908) 862-9111

A. State Manifest Document Number NJA 1895362
B. State Generator's ID (Gen. Site Address) 1500 LOWER ROAD LINDEN NJ 07036

5. Transporter 1 Company Name AUCHTER INDUSTRIAL VAC SERVICE
6. US EPA ID Number N J D 9 8 0 7 7 2 7 6 8
C. State Trans. ID-NJDEPE S6993
Decal No. 51448
D. Transporter's Phone (908) 862-2277

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Trans. ID-NJDEPE
Decal No.
F. Transporter's Phone ( )

9. Designated Facility Name and Site Address
S&W WASTE, INC.
105 JACOBUS AVENUE
SOUTH KEARNY,NJ 07032
10. US EPA ID Number N J D 9 9 1 2 9 1 1 0 5
G. State Facility's ID
H. Facility's Phone (201) 344-4004

11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. NON REGULATED MATERIAL		XX6	DM	XX330	G	ID72
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above
S&W APP.014065 (a):001
a. 90% BOTTOM INK SLUDGE
10% AQUAEOUS LIQUID
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. B4 Blending
b.
c.
d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: NICK CANALE
Signature: Nick Canale
Month Day Year: 08 05 94

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: William Mersayak
Signature: [signature]
Month Day Year: 08 05 94

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19. Discrepancy Indication Space
RECEIVED PENDING MANIFEST REVIEW & QUALITY CONTROL

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Tom Richardd
Signature: Tom [signature]
Month Day Year: 08 05 94

EPA Form 8700-22 (Rev. 9/88) Previous editions are obsolete.
3 — TSD MAIL TO - GENERATOR

SIGNATURE AND INFORMATION *MUST* BE LEGIBLE ON ALL COPIES

NJH000800224 8

RCRIS NOTIFICATION DATA DISCREPANCY FORM

EPA HWCB

U.S. EPA
AGENCY RO II
95 NOV -6 PM 5:06
PROGRAMS BRANCH

Information from RCRIS

Facility Name: Squire Corrugated Container Corp.
Facility EPA ID Number: NJD 042 024 482
Facility Address: 1500 Lower Road
City: Linden St: NJ Zip: 07036
Mailing Address:
City: St: Zip:
Facility Contact: Phone: - -
Owner/Operator:
SIC Code(s):
Waste Codes:
Generator Status (LQG/SQG)
Other:

New Information (make change to "E" record only)

Facility Name:
Facility EPA ID Number:
Facility Address:
City: St: Zip:
Mailing Address:
City: St: Zip:
Facility Contact: James Beneroff Phone: 908-862-9111
Owner/Operator:
SIC Code(s): 2653
Waste Codes:
Generator Status (LQG/SQG)
Other: 5-6 gal/yr of waste oil is generated and recycled.

In response to this request, please modify RCRIS Handler Notification Data for the following:

General Generator Information:

	Facility Name
	Facility Address
✓	Facility Contact
✓	SIC Code(s)
✓	Other

	EPA ID Number
	Mailing Address
✓	Phone
	Waste Code(s)

Contact: Sam Kerns Phone: X-4139

Effective Date of Change: 5-3-95

Add/Change Generator Status Codes:

C	#	
	1	conditionally exempt Small Quantity Generator
	2	Definitionally Excluded Wastes
	3	Delisted Wastes
✓	4	One-time Hazardous Waste Generator → X726 (1988)
	5	Periodic Hazardous Waste Generator

C	#	
✓	6	No longer Generates HW; Still in Business
	7	No longer Generates HW; Out of Business
	8	Never Generated Hazardous Waste
	9	ID Number to Transport Non-Hazardous Waste
	10	Regulated Under Another ID Number(s) (list below)

Gen = 2/2N6 99

John Garman, Chief, NYCS — Date 11/7/95